

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA :

CASE NO. 3:19-cr-169

Plaintiff :

vs. :

Judge Thomas M. Rose

ETHAN KOLLIE :

Defendant :

MOTION FOR MODIFICATION OF BOND CONDITIONS ORDER

Now comes Defendant Ethan Kollie, by and through undersigned counsel pursuant to 18 U.S.C. §3145(b), and hereby moves this Honorable Court to for an ORDER amending the ORDER OF DETENTION issued by Magistrate Judge Michael J. Newman on August 15, 2019 (Doc.#14).

Respectfully submitted,

s/Nicholas G. Gounaris

NICHOLAS G. GOUNARIS (0064527)

GOUNARIS ABBOD CO.

Co-Counsel for Defendant, Ethan Kollie

130 W. Second Street, Suite 2000

Dayton, Ohio 45402

(937) 222-1515

(937) 222-1224 fax

nick@gafirm.com

**GOUNARIS ABBOD
INC., LPA**

A Legal Professional Association
130 W. Second St., Ste. 2000
Dayton, Ohio 45402
Office: (937) 222-1515
Facsimile: (937) 222-1224
Website: www.gafirm.com

/s/Antony A. Abboud
ANTONY A. ABBOUD(0078151)
GOUNARIS ABBOUD CO.
Co-Counsel for Defendant, Ethan Kollie
130 W. Second Street, Suite 2000
Dayton, Ohio 45402
(937) 222-1515
(937) 222-1224 fax
tony@gafirm.com

MEMORANDUM

Mr. Kollie is a United States citizen who is now charged by way of an INFORMATION containing two (2) violations: 18 U.S.C. §922(g)(3) and 18 U.S.C. §924(a)(1)(A).

On August 9, 2019, Mr. Kollie made his initial appearance before Magistrate Judge Newman. On August 14 and 15, 2019, Magistrate Judge Newman held a detention hearing and determined that there were no conditions of release that would (1) reasonably assure the appearance of Mr. Kollie and (2) protect the safety of the community.

Mr. Kollie is expected to enter a plea of guilty pursuant to a plea agreement on November 20, 2019. Considering that he will resolve his case by way of a plea agreement, Mr. Kollie respectfully requests that this Honorable Court modify the August 15, 2019 ORDER OF DETENTION and allow him to be released pending sentencing with reasonable conditions. This request has been communicated to the Government, and it **DOES** object to the request.

Respectfully submitted,

s/Nicholas G. Gounaris

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GOUNARIS ABBOD CO.

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/s/Antony A. Abboud

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GOUNARIS ABBOD CO.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent to all parties via the clerk of court's electronic filing system.

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